



Louisville Metro Air Pollution Control District  
850 Barret Avenue  
Louisville, Kentucky 40204-1745



## **Federally Enforceable District Origin Operating Permit (FEDOOP)**

Permit No.: 36523-13-F

Plant ID: 1806

Effective Date: [Click here to enter a date.](#)    Expiration Date: [Click here to enter a date.](#)    Fee: \$1,116.25

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

IQL Corporation  
8055 National Turnpike  
Louisville, KY 40214

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant:	PM <sub>10</sub>	VOC	Single HAP	Total HAP
Tons/year:	< 50	< 50	< 10	< 25

Application No.:    36523  
                             31678  
                             36933

Application Received: 5/18/2005  
   8/12/2011  
   12/27/2012

Permit Writer:                      Dustin Gohs

Public Notice Date:              4/9/2013

Proposed Permit Date:         4/9/2013

{manager1}  
Air Pollution Control Officer  
{date1}

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**Permit Revisions/Changes**

<b>Revision No.</b>	<b>Issue Date</b>	<b>Type</b>	<b>Page No.</b>	<b>Description</b>
NA	__/__/12	Initial	Entire Permit	FEDOOP Permit Reissuance and Addition of New Equipment

### Acronyms and Abbreviations

AP-42	- AP-42, Compilation of Air Pollutant Emission Factors, published by USEPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Background Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
FEDOOP	- Federally Enforceable, District Origin Operating Permit
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- hour
in.	- inches
lbs	- pounds
l	- liter
LMAPCD	- Louisville Metro Air Pollution Control District
mm <sub>Hg</sub>	- millimeters of mercury column height
MM	- million
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- pounds per square inch absolute
QA	- Quality Assurance
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- water column
year	- any period of twelve consecutive months, unless "calendar year" is specified
yr	- year, or any 12 consecutive-month period, as determined by context

**Preamble**

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of applicable fees is not made after receipt of the statement of fees (SOF). The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

### **General Conditions**

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-0.
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or an anticipated noncompliance shall not alter any permit requirement.
9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.

10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter PM<sub>10</sub>, sulfur dioxide, carbon monoxide, photochemical oxidants, hydrocarbons, nitrogen oxides, lead, gaseous fluorides, or Volatile Organic Compounds (VOC) as listed in District Regulation 3.04; any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gasses whose combined global warming potential equals or exceeds 100,000 tons CO<sub>2</sub>-equivalent, as defined in 40 CFR 98 (except that prior to July 21, 2014, the mass of the greenhouse gas carbon dioxide shall not include biogenic carbon dioxide emissions defined in 40 CFR 52.21(b)(49)(ii)(a)). Fugitive emissions shall be included in these limits.
11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company. The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

<b>Regulation</b>	<b>Title</b>
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)

<b>Regulation</b>	<b>Title</b>
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards



15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District  
Room 205  
850 Barret Ave  
Louisville, KY 40204-1745***

**Emission Unit U1****U1 (Hansen ID: 31678)****U1 Unit Description:** Paint Booths

Two (2) Global Finishing Solutions paint booths, models IFP-161012 and IFP-16812, used to control emissions from two (2) Spraytech airless spray guns, model 1720, each with a spray capacity of 0.33 gal/min and two (2) Binks airless spray guns, model AA1600M, each with a spray capacity of 0.4 gal/min.

**U1 Applicable Regulations**

<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permit	1 – 9
5.00	Definitions	1
5.01	General Provisions	1, 2
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 – 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 – 5
5.21	Environmental Acceptability for Toxic Air Contaminants	1 – 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 – 5
5.23	Categories of Toxic Air Contaminants	1 – 6
7.08	Standards of Performance for New Process Operations	1 – 3
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	1 – 7

**U1 Equipment**

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Maximum Capacity</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>	<b>Stack ID</b>	<b>Application Date</b>
E1	Global Finishing Solutions/ IFP-161012	0.73 gal/min	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 7.59	Filters	S1	4/6/2004
E2	Global Finishing Solutions/ IFP-16812	0.73 gal/min	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 7.59	Filters	S2	4/6/2004

### U1 Specific Conditions

#### S1. Standards (Regulation 2.17, section 5.1)

##### a. VOC

- i. The owner or operator shall not exceed fifty (50) tons of VOC emissions per year including all coatings, additives, catalysts, solvents, thinners, and cleaners. (Regulation 2.08, section 2.5.1.4)
- ii. No coating shall be used with a VOC content, as applied, in excess of the following limits during a calendar month averaging period: (Regulation 7.59, section 3.1)

Coating	VOC lb/gal	VOC kg/l
Clear coatings	4.3	0.52
Air-dried coatings	3.5	0.42
Extreme performance coatings	3.5	0.42
All other coatings	3.0	0.36

##### b. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

##### c. PM/PM<sub>10</sub>

- i. The owner or operator shall not allow plant-wide PM<sub>10</sub> emissions to equal or exceed 50 tons per 12 consecutive month period. (Regulation 2.17, section 5.1)
- ii. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr for each paint booth. (Regulation 7.08, section 3.1.2)
- iii. The owner or operator shall utilize controls at all times the process equipment is in operation and shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. (Regulation 2.03, section 5.1)

##### d. HAP

- i. The owner or operator shall not allow plant-wide single HAP emissions to equal or exceed 10 tons per 12 consecutive month period. (Regulation 2.17, section 5.1)
- ii. The owner or operator shall not allow plant-wide total HAP emissions to exceed 25 tons per 12 consecutive month period. (Regulation 2.17, section 5.1)

- iii. The owner or operator shall not use any spray application coatings, additives, catalyst, solvents, or thinners containing amounts of compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) that exceed the limits of 0.1% by mass for carcinogens or 1.0% for other individual HAP compounds. (See Comment 1)

e. **TAC**

- i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)
- ii. The owner or operator shall not allow emissions of Xylene to exceed 48,000 pounds per 12 consecutive month period or 54 pounds per hour. (Regulation 5.21, section 4.3) (See Comment 2)
- iii. The owner or operator shall not allow emissions of Manganese to exceed 24 pounds per 12 consecutive month period or 0.027 pounds per hour. (Regulation 5.21, section 4.3) (See Comment 2)
- iv. The owner or operator shall limit the use of enamel coatings to 4,490 gallons per paint booth during any 12 consecutive month period. (Regulation 5.21, section 4.3) (See Comment 2)

S2. **Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

a. **VOC**

- i. An owner or operator of an affected facility subject to this regulation shall maintain records that include, but not be limited to, the following: (Regulation 7.59, section 6.1)
  - 1) The regulation and section number applicable to the affected facility for which the records are being maintained,
  - 2) The application method and substrate type (metal, plastic, etc.),
  - 3) The amount and type of coatings (including catalyst and reducer for multi-component coatings) and solvent (including exempt compounds) used at each point of application during the calendar month. The District may specifically authorize the usage record to reflect a period longer than the compliance averaging period, with the usage prorated for each compliance averaging period by a method approved by the District. In this case, the usage record period shall not exceed 1 calendar month,
  - 4) The VOC content as applied in each coating and solvent,

- 5) The date, or usage record period, for each application of coating and solvent,
  - 6) The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used during the calendar month. The District may specifically authorize the usage record to reflect a period longer than the compliance averaging period, with the usage prorated for each compliance averaging period by a method approved by the District. In this case, the usage record period shall not exceed 1 calendar month.
- ii. The VOC content shall be calculated using a percent solids basis (excluding water and exempt solvents) for coatings using EPA [Method 24](#). (Regulation 7.59, section 6.2)
  - iii. The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc.
  - iv. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month total VOC emissions each calendar month to demonstrate compliance with the fifty (50) ton per year limit.

**b. Opacity**

See Specific Condition S2.c.

**c. PM/PM<sub>10</sub>**

- i. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month emissions for PM<sub>10</sub> for each calendar month.
- ii. The owner or operator shall inspect the filters in the paint booth(s) at least monthly to ensure proper installment (i.e. proper alignment/placement, gaps, etc.) and replace as needed.
- iii. The owner or operator shall keep a record that shows the date and the name of the person who inspected the filters, and if filters were replaced.
- iv. The owner or operator shall maintain daily records of any periods of time where the process was operating and the control device was not operating or a declaration that the control device operated at all times that day when the process was operating.
- v. If there is any time that the control device is bypassed or not in operation when the process is operating, then the owner or operator shall keep a record of the following for each bypass event:
  - 1) Date;
  - 2) Start time and stop time;
  - 3) Identification of the control device and process equipment;
  - 4) PM emissions during the bypass in lb/hr;

- 5) Summary of the cause or reason for each bypass event;
- 6) Corrective action taken to minimize the extent or duration of the bypass event; and
- 7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

d. **HAP**

- i. The owner or operator shall keep a record of the MSDS for each raw material.
- ii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month emissions for each individual HAP for each calendar month.
- iii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month emissions of total HAP for each calendar month.

e. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.
- iii. The owner or operator shall maintain records, monthly, of the type and amount of enamel coatings used in each paint booth.
- iv. If the usage of enamel coatings exceeds 4,490 gallons for any one paint booth during any consecutive 12-month period, the owner or operator shall calculate the emissions of Manganese and Xylene for the calendar month in which the consecutive 12-month usage limit was exceeded. The owner or operator shall then calculate the total emissions for Manganese and Xylene for the preceding 11 months to determine if the annual TAC limits have been exceeded. The owner or operator shall continue to calculate the monthly and consecutive 12-month Manganese and Xylene emissions until such time the consecutive 12-month usage of enamel coatings is 4,490 gallons or less.

S3. **Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall submit annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within sixty (60) days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.17, section 3.5:

- “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete.”
- Signature and title of the responsible official of the company.

The Annual Compliance Report is due on or before the following date of each calendar year:

Reporting Period

January 1<sup>st</sup> through December 31<sup>st</sup>

Report Due Date

March 1<sup>st</sup>

The Annual Compliance Certification is due on or before the following date of each calendar year:

Reporting Period

January 1<sup>st</sup> through December 31<sup>st</sup>

Report Due Date

April 15<sup>th</sup>

If a change in the “Responsible Official” (RO) occurs during the term of this permit, the owner or operator shall provide notification (Form 100A) to the District within thirty (30) calendar days following the date a change in the designated RO occurs for this facility.

a. **VOC**

- The owner or operator shall include in the annual report the monthly and consecutive 12-month emissions for VOC.

b. **Opacity**

See Specific Condition S3.c.ii for Opacity reporting requirements.

c. **PM/PM<sub>10</sub>**

- The owner or operator shall include in the annual report the monthly and consecutive 12-month emissions for PM<sub>10</sub>.
- The owner or operator shall report the following information regarding PM By-Pass Activity in the annual compliance reports.
  - Number of times the PM vent stream by-passes the control device and is vented to the atmosphere;
  - Duration of each by-pass to the atmosphere;
  - Calculated pound per hour PM emissions for each by-pass; or
  - A negative declaration if no by-passes occurred.

d. **HAP**

The owner or operator shall include in the annual report the monthly and consecutive 12-month emissions for each individual HAP and total HAP.

e. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.e.ii.
- iv. The owner or operator shall include in the annual report the monthly and consecutive 12-month records of the enamel coating usage. If emissions calculations were performed due to an exceedance of the enamel coating usage limit, the owner or operator shall include in the report the monthly and consecutive 12-month emissions for Manganese and Xylene.

#### U1 Comments

1. The equipment or processes covered by this permit are not currently subject to the standards of the NESHAP, [40 CFR 63 subpart HHHHHH](#), due to the absence of chromium (Cr), lead (Pb), nickel (Ni) and cadmium (Cd). Though one enamel coating contains manganese (Mn), the concentration is not greater than 1.0% by mass.
2. A one-time compliance demonstration has been performed for this equipment, and it has been determined that with a limit of 4,490 gallons per paint booth per 12 consecutive month period, the equipment cannot exceed the de minimis limits for Manganese and Xylene.
3. This equipment was previously permitted under FEDOOP Permit 187-05-F.



**Emission Unit U2****U2 (Operating ID: 36933)****U2 Unit Description:** Welding Operations

Nineteen (19) welding stations used for constructing conveyor parts.

**U2 Applicable Regulations**

<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permit	1 – 9
5.00	Definitions	1
5.01	General Provisions	1, 2
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 – 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 – 5
5.21	Environmental Acceptability for Toxic Air Contaminants	1 – 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 – 5
5.23	Categories of Toxic Air Contaminants	1 – 6
7.08	Standards of Performance for New Process Operations	1 – 3
40 CFR 63, Subpart XXXXXX	National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories	63.11514, 63.11515, 63.11516, 63.11519

**U2 Equipment**

<b>Emission Point ID</b>	<b>Description Make/ Model</b>	<b>Maximum Capacity</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>	<b>Stack ID</b>	<b>Application Date</b>
E3	Miller/ CP-302 (17H)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E4	Miller/ CP-302 (17C)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E5	Miller/ CP-302 (17G)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012

<b>Emission Point ID</b>	<b>Description Make/ Model</b>	<b>Maximum Capacity</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>	<b>Stack ID</b>	<b>Application Date</b>
E6	Miller/ CP-302 (17E)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E7	Miller/ CP-302 (17I)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E8	Miller/ CP-302 (17B)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E9	Miller/ CP-302 (#4)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E10	Miller/ CP-302 (17J)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E11	Miller/ CP-302 (17A)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E12	Miller/ CP-302 (17F)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E13	Miller/ CP-302 (#19)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E14	Miller/ CP-302 (17K)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E15	Miller/ CP-302 (17L)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012

<b>Emission Point ID</b>	<b>Description Make/ Model</b>	<b>Maximum Capacity</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>	<b>Stack ID</b>	<b>Application Date</b>
E16	Miller/ CP-302 (17M)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E17	Miller/ 452 (17O)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E18	Miller/ 350 P (17N)	42,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E19	Miller/ 452 (17P)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E20	Miller/ 250-DX TIG (17D)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012
E21	Miller/ 251 (17Q)	45,000 in/hr	2.17, 5.00, 5.01, 5.02, 5.20, 5.21, 5.22, 5.23, 7.08, 40 CFR 6X	N/A	N/A	12/27/2012

**U2 Specific Conditions****S1. Standards (Regulation 2.17, section 5.1)****a. HAP**

- i. The owner or operator shall not allow plant-wide single HAP emissions to equal or exceed 10 tons per 12 consecutive month period. (Regulation 2.17, section 5.1)
- ii. The owner or operator shall not allow plant-wide total HAP emissions to exceed 25 tons per 12 consecutive month period. (Regulation 2.17, section 5.1)
- iii. The owner or operator shall operate all equipment, capture, and control devices associated with welding operations according to the manufacturer's instructions. (40 CFR 63.11516(f)(1))
- iv. The owner or operator shall comply with the requirements in paragraphs (f)(1) and (2) of 40 CFR 63 Subpart XXXXXX for each welding operation that uses materials containing Metal Fabrication and Finishing HAPs (MFHAP), as defined in §63.11522, or has the potential to emit MFHAP. If the welding affected source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), the owner or operator shall demonstrate that management practices or fume control measures are being implemented by complying with the requirements in paragraphs (f)(3) through (f)(8) of 40 CFR 63, subpart XXXXXX. The requirements in paragraphs (f)(1) through (f)(8) do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP. (40 CFR 63.11516(f))
  - 1) The owner or operator shall operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The owner or operator shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices. (40 CFR 63.11516(f)(1))
  - 2) The owner or operator shall implement one or more of the following management practices to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment. (40 CFR 63.11516(f)(2))
    - (a) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW) – also called metal inert gas welding (MIG)); CFR (40 CFR 63.11516(f)(2)(i))

- (b) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates; (40 CFR 63.11516(f)(2)(ii))
  - (c) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation; (40 CFR 63.11516(f)(2)(iii))
  - (d) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and (40 CFR 63.11516(f)(4)(iv))
  - (e) Use a welding fume capture and control system, operated according to the manufacturer's specifications. (40 CFR 63.11516(f)(2)(v))
- 3) *Tier 1 compliance requirements.* The owner or operator shall perform visual determinations of welding fugitive emissions at the primary vent, stack, exit, or opening from the building containing the welding operations. The owner or operator shall keep a record of all visual determinations of fugitive emissions along with any corrective action taken. (40 CFR 63.11516(f)(3))
- 4) *Requirements upon initial detection of visible emissions from welding.* If visible fugitive emissions are detected during any visual determination, the owner or operator shall comply with the following requirements. (40 CFR 63.11516(f)(4))
- (a) The owner or operator shall perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures. After completing such corrective action, the owner or operator shall perform a follow-up inspection for visible fugitive emissions at the primary vent, stack, exit, or opening from the building containing the welding operations. (40 CFR 63.11516(f)(4)(a))
  - (b) The owner or operator shall report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with your annual certification and compliance report. (40 CFR 63.11516(f)(4)(b))
- 5) *Tier 2 requirements upon subsequent upon detection of visible emissions.* If visible fugitive emissions are detected more than once during any consecutive 12-month period (notwithstanding the results of any follow-up inspections), the owner or operator shall comply with the following requirements. (40 CFR 63.11516(f)(5))

- (a) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, the owner or operator shall conduct a visual determination of emissions opacity at the primary vent, stack, exit, or opening from the building containing the welding operations. (40 CFR 63.11516(f)(5)(i))
  - (b) In lieu of the requirement to perform visual determinations of fugitive emissions with EPA Method 22, the owner or operator shall perform visual determinations of emissions opacity using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations. (40 CFR 63.11516(f)(5)(ii))
  - (c) The owner or operator shall keep a record of each visual determination of emissions opacity performed along with any subsequent corrective action taken. (40 CFR 63.11516(f)(5)(iii))
  - (d) The owner or operator shall report the results of all visual determinations of emissions opacity along with any subsequent corrective action taken, and submit with your annual certification and compliance report. (40 CFR 63.11516(f)(5)(iv))
- 6) *Requirements for opacities less than or equal to 20 percent but greater than zero.* For each visual determination of emissions opacity performed for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, the owner or operator shall perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures. (40 CFR 63.11516(f)(6))
- 7) *Tier 3 requirements for opacities exceeding 20 percent.* For each visual determination of emissions opacity performed for which the average of the six-minute average opacities recorded exceeds 20 percent, the owner or operator shall comply with the following requirements. (40 CFR 63.11516(f)(7))
- (a) The owner or operator shall submit a report of exceedence of 20 percent opacity, along with the annual certification and compliance report. (40 CFR 63.11516(f)(7)(i))
  - (b) Within 30 days of the opacity exceedence, the owner or operator shall prepare and implement a Site-Specific Welding Emissions Management Plan. If a Site-Specific Welding Emissions Management Plan already exists at the facility, the owner or operator shall prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days. (40 CFR 63.11516(f)(7)(ii))

- (c) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the owner or operator shall continue to perform visual determinations of emissions opacity, beginning on a daily schedule using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations. (40 CFR 63.11516(f)(7)(iii))
  - (d) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the owner or operator shall keep a record of each visual determination of emissions of opacity performed. (40 CFR 63.11516(f)(7)(iv))
  - (e) The owner or operator shall include these records in the annual certification and compliance report. (40 CFR 63.11516(f)(7)(v))
- 8) *Site-Specific Welding Emissions Management Plan.* The Site-Specific Welding Emissions Management Plan shall comply with the following requirements. (40 CFR 63.11516(f)(8))
- (a) The Site-Specific Welding Emissions Management Plan shall contain the following information. (40 CFR 63.11516(f)(8)(i))
    - (1) Company name and address; (40 CFR 63.11516(f)(8)(i)(A))
    - (2) A list and description of all welding operations which currently comprise the welding affected source; (40 CFR 63.11516(f)(8)(i)(B))
    - (3) A description of all management practices and/or fume control methods in place at the time of the opacity exceedence; (40 CFR 63.11516(f)(8)(i)(C))
    - (4) A list and description of all management practices and/or fume control methods currently employed for the welding affected source; (40 CFR 63.11516(f)(8)(i)(D))
    - (5) A description of additional management practices and/or fume control method to be implemented pursuant to paragraph (f)(7)(ii), and the projected date of implementation; and (40 CFR 63.11516(f)(8)(i)(E))
    - (6) Any revisions to a Site-Specific Welding Emissions Management Plan shall contain copies of all previous plan entries. (40 CFR 63.11516(f)(8)(i)(F))
  - (b) The owner or operator shall update the Site-Specific Welding Emissions Management Plan annually and submit

with the annual certification and compliance report. (40 CFR 63.11516(f)(8)(ii))

- (c) The owner or operator shall maintain a copy of the current Site-Specific Welding Emissions Management Plan in the company records in a readily-accessible location for inspector review. (40 CFR 63.11516(f)(8)(iii))

b. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

c. **PM/PM<sub>10</sub>**

- i. The owner or operator shall not allow plant-wide PM<sub>10</sub> emissions to equal or exceed 50 tons per 12 consecutive month period. (Regulation 2.17, section 5.1)
- ii. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr per welding machine. (Regulation 7.08, section 3.1.2) (See Comment 1)

d. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

S2. **Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

a. **HAP**

- i. The owner or operator shall keep a record of the MSDS for each raw material.
- ii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month emissions for each individual HAP for each calendar month.
- iii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month emissions of total HAP for each calendar month.
- iv. *Visual determination of fugitive emissions, general.* Visual determinations of fugitive emissions shall be performed according to the procedures of EPA Method 22, of 40 CFR part 60, Appendix A-7. The owner or operator shall conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test shall be at least fifteen (15) minutes, and visible emissions will be



considered to be present if they are detected for more than six (6) minutes of the fifteen (15) minute period. (40 CFR 63.11517(a))

- v. *Visual determination of fugitive emissions, graduated schedule.* Visual determinations of fugitive emissions shall be performed in accordance with the paragraph above according to the following schedule. (40 CFR 63.11517(b))
  - 1) *Daily Method 22 Testing.* The owner or operator shall perform visual determinations of fugitive emissions once per day, on each day the process is in operation, during operation of the process. (40 CFR 63.11517(b)(1))
  - 2) *Weekly Method 22 Testing.* If there are no visible fugitive emissions detected in ten (10) consecutive daily tests, the frequency may be reduced to testing once every calendar week (five (5) work days of operation). If visible fugitive emissions are detected during these tests, the owner or operator shall resume testing of that operation once per day during each day that the process is in operation. (40 CFR 63.11517(b)(2))
  - 3) *Monthly Method 22 Testing.* If there are no visible fugitive emissions detected in four (4) consecutive weekly tests, the frequency may be reduced to testing once every calendar month (twenty-one (21) work days of operation). If visible fugitive emissions are detected during these tests, the owner or operator shall resume weekly testing. (40 CFR 63.11517(b)(3))
  - 4) *Quarterly Method 22 Testing.* If there are no visible fugitive emissions detected in three (3) consecutive monthly tests, the frequency may be reduced to testing once every three (3) calendar months (sixty (60) work days of operation). If visible fugitive emissions are detected during these tests, the owner or operator shall resume monthly testing. (40 CFR 63.11517(b)(4))
- vi. *Visual determination of emissions opacity for welding Tier 2 or 3, general.* Visual determination of emissions opacity shall be performed in accordance with the procedures of EPA Method 9, of 40 CFR part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty (30) minutes. (40 CFR 63.11517(c))
- vii. *Visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule.* The owner or operator shall perform visual determinations of emissions opacity in accordance with the paragraph above and according to the following schedule. (40 CFR 63.11517(d))
  - 1) *Daily Method 9 testing for welding, Tier 2 and 3.* The owner or operator shall perform visual determinations of emissions opacity

once per day during each day that the process is in operation. (40 CFR 63.11517(d)(1))

- 2) *Weekly Method 9 testing for welding Tier 2 and 3.* If the average of the six (6) minute opacities recorded during any of the daily consecutive EPA Method 9 tests does not exceed twenty (20%) percent for ten (10) days of operation of the process, the owner or operator may decrease the frequency of the EPA Method 9 testing to once per five (5) days of consecutive work day operation. If opacity greater than twenty (20%) percent is detected during any of these tests, the owner or operator shall resume testing every day of operation of the process. (40 CFR 63.11517(d)(2))
- 3) *Monthly Method 9 testing for welding Tier 2 and 3.* If the average of the six (6) minute opacities recorded during any of the consecutive weekly EPA Method 9 test does not exceed twenty (20%) percent for four (4) consecutive weekly tests, the owner or operator may decrease the frequency of the EPA Method 9 testing to once per twenty-one (21) days of operation of the process. If visible emissions opacity greater than twenty (20%) percent is detected during any quarterly test, the owner or operator shall resume testing every twenty-one (21) days (month) of operation of the process. (40 CFR 63.11517(d)(3))
- 4) *Quarterly Method 9 testing for welding Tier 2 or 3.* If the average of the six (6) minute opacities recorded during any of the consecutive weekly EPA Method 9 tests does not exceed twenty (20%) percent for three (3) consecutive monthly tests, the owner or operator may decrease the frequency of the EPA Method 9 testing to once every one hundred twenty (120) days of operation of the process. If visible opacity emissions greater than twenty (20%) percent is detected during any quarterly test, the owner or operator shall resume testing every twenty-one (21) days (month) of operation of the process. (40 CFR 63.11517(d)(4))
- 5) *Return to Method 22 testing for welding, Tier 2 or 3.* If, after two (2) consecutive months of testing, the average six (6) minute opacities recorded during any of the monthly EPA Method 9 tests does not exceed twenty (20%) percent, the owner or operator may resume EPA Method 22 testing. In lieu of this, the owner or operator may elect to continue performing EPA Method 9 testing. (40 CFR 63.1117(d)(5))

viii. The owner or operator shall collect and maintain records of the data and information specified in paragraphs (c)(1) through (c)(13) of 40 CFR 63, subpart XXXXXX, according to the requirements in paragraph (c)(14) of 40 CFR 63, subpart XXXXXX. (40 CFR 63.11519(c))

- 1) The owner or operator shall maintain information specified in the following paragraphs. (40 CFR 63.11519(c)(1))

- (a) A copy of each notification and report that is submitted to comply with this subpart, and the documentation supporting each notification and report. (40 CFR 63.11519(c)(1)(i))
  - (b) Records of the applicability determinations listing equipment included in its affected source, as well as any changes and on what date they occurred. (40 CFR 63.11519(c)(1)(ii))
- 2) The owner or operator shall maintain a record of the following information for each affected source which performs visual determinations of fugitive emissions. (40 CFR 63.11519(c)(2))
  - (a) The date of every visual determination of fugitive emissions; (40 CFR 63.11519(c)(2)(i))
  - (b) A description of any corrective action taken subsequent to the test; and (40 CFR 63.11519(c)(2)(ii))
  - (c) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions. (40 CFR 63.11519(c)(2)(iii))
- 3) The owner or operator shall maintain a record of the following information for each affected source which performs visual determinations of emissions opacity. (40 CFR 63.11519(c)(3))
  - (a) The date of every visual determination of emissions opacity; (40 CFR 63.11519(c)(3)(i))
  - (b) The average of the six (6) minute opacities measured by the test; and (40 CFR 63.11519(c)(3)(ii))
  - (c) A description of any corrective action taken subsequent to the test. (40 CFR 63.11519(c)(3)(iii))
- 4) The owner or operator shall maintain a record of the manufacturer's specifications for the control devices. (40 CFR 63.11519(c)(4))
- 5) The owner or operator shall maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan. (40 CFR 63.11519(c)(11))
- 6) If the owner or operator has been required to prepare a Site-Specific Welding Emissions Management Plan, a copy of the plan shall be maintained in the company's records. (40 CFR 63.11519(c)(12))
- 7) If the owner or operator complies with this subpart by operating any equipment according to manufacturer's instructions, the owner or operator shall maintain a copy of these instructions. (40 CFR 63.11519(c)(13))

- 8) If the owner or operator operates a new or existing welding affected source which is not required to comply with the requirements of §63.11516(f)(3) through (f)(8) because it uses less than 2,000 pounds per year of welding rod/wire (on a rolling 12-month basis), the owner or operator shall maintain records demonstrating the welding rod/wire usage on a rolling 12-month basis. (40 CFR 63.11519(c)(14))
- 9) The owner or operator shall maintain records according to the following requirements. (40 CFR 63.11519(c)(15))
  - (a) Records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records shall be maintained as electronic spreadsheets or in a database. (40 CFR 63.11519(c)(15)(i))
  - (b) Records shall be retained for five (5) years following the date of each occurrence, measurement, corrective action, report, or record. (40 CFR 63.11519(c)(15)(ii))
  - (c) Records shall be retained on-site for at least two (2) years after the date of each occurrence, measurement, corrective action, report, or record. The owner or operator may choose to keep the records off-site for the remaining three (3) years. (40 CFR 63.11519(c)(15)(iii))

b. **Opacity**

See section S2.a for monitoring and recordkeeping requirements.

c. **PM/PM<sub>10</sub>**

The owner or operator shall monthly calculate and record the monthly and consecutive 12-month emissions for PM<sub>10</sub> for each calendar month.

d. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.

S3. **Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall submit annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within sixty (60) days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.17, section 3.5:

- “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete.”
- Signature and title of the responsible official of the company.

The Annual Compliance Report is due on or before the following date of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 <sup>st</sup> through December 31 <sup>st</sup>	March 1 <sup>st</sup>

The Annual Compliance Certification is due on or before the following date of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 <sup>st</sup> through December 31 <sup>st</sup>	April 15 <sup>th</sup>

If a change in the “Responsible Official” (RO) occurs during the term of this permit, the owner or operator shall provide notification (Form 100A) to the District within thirty (30) calendar days following the date a change in the designated RO occurs for this facility.

a. **HAP**

- i. The owner or operator shall include in the annual report the monthly and consecutive 12-month emissions for each individual HAP and total HAP.
- ii. The owner or operator shall submit the annual certification and compliance report containing the following information specified in paragraphs (b)(4)(i) through (b)(4)(iii) of 40 CFR 63, subpart XXXXXX and the information specified in paragraphs (b)(5) through (b)(7) of 40 CFR 63, subpart XXXXXX, that is applicable to each affected source. (40 CFR 63.11519(b)(4))
  - 1) The company name and address; (40 CFR 63.11519(b)(4)(i))
  - 2) A statement by a responsible official with that official’s name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and (40 CFR 63.11519(b)(4)(ii))
  - 3) The date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. (40 CFR 63.11519(b)(4)(iii))
- iii. The annual certification and compliance report shall contain the following information for each affected source which performs visual determinations of fugitive emissions. (40 CFR 63.11519(b)(5))

- 1) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions; (40 CFR 63.11519(b)(5)(i))
  - 2) A description of the corrective actions taken subsequent to the test; and (40 CFR 63.11519(b)(4)(ii))
  - 3) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions. (40 CFR 63.11519(b)(4)(iii))
- iv. The annual certification and compliance report shall contain the following information for each affected source which performs visual determinations of emissions opacity. (40 CFR 63.11519(b)(6))
- 1) The date of every visual determination of emissions opacity; (40 CFR 63.11519(b)(6)(i))
  - 2) The average of the six (6) minute opacities measured by the test; and (40 CFR 63.11519(b)(6)(ii))
  - 3) A description of any corrective action taken subsequent to the test. (40 CFR 63.11519(b)(6)(iii))
- v. The owner or operator shall prepare an exceedance report containing the following information whenever the average of the six (6) minute average opacities recorded during a visual determination of emissions opacity exceeds twenty (20%) percent. This report shall be submitted along with the annual certification and compliance report. (40 CFR 63.11519(b)(8))
- 1) The date on which the exceedance occurred; and (40 CFR 63.11519(b)(8)(A))
  - 2) The average of the six (6) minute average opacities recorded during the visual determination of emissions opacity. (40 CFR 63.11519(b)(8)(B))
- vi. The owner or operator shall submit a copy of the records of daily visual determinations of emissions recorded and a copy of the Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan, along with the annual certification and compliance report. (40 CFR 63.11519(b)(9))
- b. **Opacity**  
See section S3.a for reporting requirements.
- c. **PM/PM<sub>10</sub>**  
The owner or operator shall include in the annual report the monthly and consecutive 12-month emissions for PM<sub>10</sub>.
- d. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.e.ii.

### **U2 Comments**

1. A one-time compliance demonstration has been performed for this equipment and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, recordkeeping, or reporting requirements with respect to PM.
2. A one-time compliance demonstration has been performed for this equipment and the emissions from the TAC Manganese cannot exceed the lb/hr or lb/yr de minimis limits. Therefore, there are no specific monitoring, recordkeeping, or reporting requirements with respect to the TAC Manganese.
3. The District has determined that the welding operation at this facility is subject to Federal Regulation 40 CFR 63, Subpart XXXXXX, as per sections 63.11514(a) and 63.11514(b). These sections state that an area source primarily engaged in “Primary Metal Products Manufacturing” which uses materials containing either 0.1% cadmium, chromium, lead, or nickel, or 1.0% manganese, is subject to 40 CFR 63, Subpart XXXXXX. This operation uses welding wire containing 1.65% manganese to perform a metal fabrication process.
4. As per Federal Regulation 40 CFR 63, Subpart XXXXXX, the Initial Notification and Notification of Compliance Status were submitted to the District on March 19, 2013.

**Permit Shield**

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all the conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance.

**Off-Permit Documents**

There are no Off-Permit Documents associated with this permit.

**Alternative Operating Scenario**

The company requested no alternative operating scenario in its FEDOOP Application.

**Insignificant Activities**

There are no Insignificant Activities operated at this facility at this time.

**FEDOOP Fee Comment**

The operating permit fee is based on plant-wide allowable emissions of less than 50 tons per year, but greater than 10 tons per year of the pollutant PM, in accordance with Regulation 2.08, section 2.6.5.4.

The operating permit fee is \$465.00 from May 2013 to May 2018 per Emission Unit (two (2) emission units).

The FEDOOP special processing fee is \$618.00.

The previous FEDOOP expired on 3/31/2011. To account for the two additional years of authorization, the less than 50 tons per permit fee for 3/2011 to 4/2013 will be applied and is \$186.25 (accounting for 25 months of a 5 year fee of \$447.00). Additionally, the FEDOOP special processing fee will be applied for the same time period and is \$247.50 (accounting for 25 months of a 5 year fee of \$594.00). There was only one emission unit in the previous FEDOOP; therefore, the fee is \$433.75. This fee is based on Fiscal year 2011.

The total operating permit fee is \$1,116.25.

The total FEDOOP special processing fee is \$865.50.

The total fee for this permit is \$1,981.75.



### Protocol Checklist for a Performance Test

A completed protocol should include the following information:

- ☐ 1. Facility name, location, and ID #;
- ☐ 2. Responsible Official and environmental contact names;
- ☐ 3. Permit numbers which are requiring the test to be conducted;
- ☐ 4. Test methods to be used (i.e. EPA Method 1, 2, 3, 4, and 5);
- ☐ 5. Alternative test methods or description of modifications to the test methods to be used;
- ☐ 6. Purpose of the test including equipment, and pollutant to be tested; the purpose may be described in the permit which requires the test to be conducted or may be to show compliance with a federal regulation or emission standard;
- ☐ 7. Tentative test dates (these may change but the District will need final notice at least 10 days in advance of the actual test dates in order to arrange for observation);
- ☐ 8. Maximum rated production capacity of the system;
- ☐ 9. Production-rate goal planned during the performance test for demonstration of compliance (if appropriate based on limits);
- ☐ 10. Method to be used for determining rate of production during the performance test;
- ☐ 11. Method to be used for determining rate of production during subsequent operations of the process equipment to demonstrate compliance;
- ☐ 12. Description of normal operation cycles;
- ☐ 13. Discussion of operating conditions that tend to cause worse case emissions; it is especially important to clarify this if worst case emissions do not come from the maximum production rate;
- ☐ 14. Process flow diagram;
- ☐ 15. List the type and manufacturer of the control equipment if any;
- ☐ 16. List the control equipment (baghouse, scrubber, condenser, etc.) parameter to be monitored and recorded during the performance test; note that this data will be used to ensure representative operation during subsequent operations. These parameters can include pressure drops, flow rates, pH, and temperature. The values achieved during the test may be required during subsequent operations to describe what pressure drops, etcetera, are indicative of good operating performance; and
- ☐ 17. How quality assurance and accuracy of the data will be maintained, including;
  - Sample identification and chain-of-custody procedures;
  - Are audit samples required for this test Method (EPA contact number for audit samples 919-541-1062) if yes then please make samples available to the District for observation during the stack test;
  - Audit sample provider;
  - Number of audit samples to be used;

- ☐ 18. Pipe, duct, stack, or flue diameter to be tested;
- ☐ 19. Distances from the testing sample ports to the nearest upstream and downstream flow disturbances such as bends, valves, constrictions, expansions, and exit points for outlet and additionally for inlet;
- ☐ 20. Determine number of traverse points to be tested for outlet and additionally for inlet if required using Appendix A-1 to 40 CFR Part 60;
  - Method 1 if stack is >12"
  - Method 1a if stack is between 4" and 12"
  - Alternate method of determination for <4"
  - If a sample location at least two stack or duct diameters downstream and half a diameter upstream from any flow disturbance is not available then an alternative procedure is available for determining the acceptability of a measurement location. This procedure described in Section 11.5 allows for the determination of gas flow angles at the sampling points and comparison of the measured results with acceptability criteria.

**End of operating permit**